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August 11, 2025

VIA ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

**Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL;
Jones et al. v. Abel et al., No. 1:25-cv-00779-LJL**

Dear Judge Liman:

As counsel for Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”), and pursuant to Your Honor’s Individual Rules, we move for continued sealing of Exhibits 20, 21, 31 – 39, 46, 53 – 57, and 59 - 61 (Dkt. 554-21, 554-22, 554-32 through 554-40, 554-47, 554-54 through 554-58, and 554-60 through 554-62) to Blake Lively’s motion to compel.

Exhibits 20, 21, 31 – 39, 46, 53 – 57, and 59 - 61 contain telephone numbers and/or email addresses of certain Wayfarer Parties and non-parties. *See In re Keurig Green Mt. Single-Serve Coffee Antitrust Litig.*, No. 14-MC-2542 (VSB), 2023 WL 196134, at *12 (S.D.N.Y. Jan. 17, 2023) (redaction of names, emails, and phone numbers of non-party individual employees of Keurig was warranted); *In re Zyprexa Products Liab. Litig.*, No. MDL1596JBWASC, 2005 WL 2237789, at *2 (E.D.N.Y. Mar. 2, 2005) (redaction of “confidential personal contact information such as home telephone numbers and addresses, pager and personal cell phone numbers, Social Security numbers” of Lilly’s non-party employees was warranted). Accordingly, the Wayfarer Parties respectfully request that Exhibits 20, 21, 31 – 39, 46, 53 – 57, and 59 - 61 (Dkt. 554-21, 554-22, 554-32 through 554-40, 554-47, 554-54 through 554-58, and 554-60 through 554-62) are permanently sealed.

For all but three of these Exhibits (which three are addressed below), we respectfully request that the Court direct Lively to resubmit the Exhibits with the telephone numbers and email addresses redacted. The Exhibits for which resubmission in redacted form is sought are Exhibits 20, 21, 31 – 32, 35, 37 – 39, 46, 53 – 57, and 59 - 61 (Dkt. 554-21, 554-22, 554-32, 554-36, 554-38 through 554-40, 554-47, 554-54 through 554-58, and 554-60 through 554-62).

The remaining three Exhibits are 33 (Dkt. 554-34), 34 (Dkt. 554-35), and 36 (Dkt. 554-37). Exhibits 33 and 34 contain nondisclosed business plans, product development information, client relationships, and/or communications regarding business affairs, and therefore are Confidential

pursuant to the Protective Order. (Dkt. 125). Exhibit 36 contains information of a personal or intimate nature regarding an individual, including the nature of personal relationships, and hence is Confidential under the Protective Order. Exhibits 33, 34 and 36 should not be resubmitted, even with telephone numbers and email addresses redacted.

Respectfully submitted,

/s/ Kevin Fritz

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